

Farmers Cellular Telephone, Inc.

A subsidiary of Farmers Telephone Cooperative, Inc.

EB 06-36 EB-06-TC-060

CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006

February 6, 2006

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, as revised by Public Notice issued on February 2, 2006, please find attached our company's submission in response to the Enforcement Bureau's request for the most recent period citing the requirements of § 64.2009(e) of the Commission's Rules.

Should you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

Farmers Cellular Telephone, Inc.

Danny Richéy Its: Secretary

cc: Bryon McCoy via e-mail byron.mccoy@fcc.gov
Best Copy and Printing, Inc., via e-mail fcc@bcpiweb.com

Before the Federal Communications Commission Washington, D.C. 20554

OF FARMERS CELLULAR TELEPHONE, INC.

EB-06-TC-060 EB Docket No. 06-36

TO: FEDERAL COMMUNICATIONS COMMISSION, ENFORCEMENT BUREAU

In response to the Commission's Public Notice, DA 06-223 (released January 30, 2006), and revised by Public Notice, DA 06-258 (released February 2, 2006), Farmers Cellular Telephone, Inc. ("Farmers Wireless") states as follows:

- 1. I am an officer of Farmers Wireless and this certificate is based on my personal knowledge.
- 2. Farmers Wireless is an affiliate of Farmers Telecommunications Cooperative, Inc., a small rural local exchange carrier. Farmers Wireless provides service to less than 11,000 cellular customers.
- 3. Farmers Wireless implemented the following measures to comply with the FCC rules contained in the subpart addressing Customer Proprietary Network Information ("CPNI") for 2005:
 - (a) Farmers Wireless elected to use CPNI only to market to its customers the same category of services and products that the customer currently received from Farmers Wireless, which is a use that does not require customer approval in accordance with 47 C.F.R. § 64.2005;
 - (b) Farmers Wireless did not turn over CPNI to any third parties in 2005;
 - (c) Farmers Wireless does not tolerate the use of CPNI by employees in any fashion other than as described above with compliance subject to the normal disciplinary process of Farmers Wireless;

- (d) Farmers Wireless has records of how it used CPNI as described in (a) above in 2005 (in the form of advertising and marketing records);
- (e) As referenced in (b) above CNPI was not disclosed to third parties in 2005, however, in the event that Farmers Wireless later seeks to utilize, disclose or permit CPNI access and that includes disclosure to third parties, Farmers Wireless will maintain a record of all instances where CPNI is disclosed or provided to third parties in the future, or where third parties are allowed access to CPNI. Such record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. This record shall be retained for a minimum of one year.
- (f) Farmers Wireless sales personnel are required to obtain supervisory approval of any proposed outbound marketing campaign.
- 4. Farmers Wireless has not undertaken to solicit customer approval through opt-out or opt-in mechanisms because it has only used CPNI in those instances that are permitted without customer approval in accordance with 47 C.F.R. § 64.2005. However, in the event that Farmers Wireless later seeks to utilize, disclose or permit CPNI access such that customer approval is required under the Commission's CPNI Rules, Farmers Wireless will, if it utilizes an opt-out method, provide written notice within five business days to the Commission of any future instance where the opt-out mechanisms do not work properly, except when such incident is isolated and an anomaly.
- 5. Farmers Wireless plans to adopt additional procedures to ensure familiarity and compliance with the Commission's CPNI rules in the event that it should later decide to utilize, disclose or permit access to CPNI for any purpose that requires customer approval.

	Farmers Cellular Telephone, Inc.	
	By:	Adj.
	Danny Richey	
	Its: Secretary	
DATED: 2/6/2006		